

In The United States District Court For The  
 Western District of Virginia  
 Charlottesville Division

CLERK'S OFFICE U.S. DIST. COURT  
 AT CHARLOTTESVILLE, VA  
 FILED

OCT 19 2021

Sines, et al, Plaintiffs, vs.

Kessler, et al, Defendants - Civil Case No.

JULIA G. DUDLEY, CLERK  
 BY: [Signature] DEPUTY CLERK

## Defendant's Motion For Extension of Time to Respond

Comes now, the Defendant, Christopher Cantwell, and he moves this Court to grant him additional time to respond to all motions filed since September 1st 2021. In support, he states as follows.

1) As noted in prior motions and declarations Cantwell has had his trial preparations made impossible by circumstances beyond his control. Those facts and arguments are incorporated by reference herein.

2) Specific to the issue at hand in this motion, Cantwell has seen only the Plaintiffs' witness list, though he is informed by outside contacts that his co-defendants have timely filed theirs with the Court. Cantwell has seen zero motions in limine, and zero Exhibits lists.

3) Cantwell is likewise informed that the Plaintiffs have filed a sweeping request to see most or all of his pretrial motions stricken from the record, but as of 10-14-2021 has not seen this motion.

- 4) Cantwell is consequently not in any position to respond to that which he has not seen.
- 5) This matter is scheduled for trial ~~in~~ in just 11 days.
- 6) Sometime before that trial date, Cantwell will be stripped of all his property, including legal papers, for the 4<sup>th</sup> time this year, when he is transported for that trial from Oklahoma to Virginia.
- 7) Plaintiffs' Counsel seem to be under the impression that there is something unusual about a man making the acquaintance of convicted criminals in a penitentiary, have moved to prohibit Cantwell from seeking legal advice from the same, and in any case Cantwell is unable to communicate with his "lay Counsel" William White, during his transport for trial.
- 8) Cantwell consequently requires time to research ~~the~~ the legal issues being addressed in the motions he has not yet seen, and ideally this work would not be interrupted by government agents taking his papers away before a sudden airplane ride and transfer to a yet to be announced destination.

- 9) While difficult bordering on impossible to separate from the separate motion to continue, the issue here addressed is nonetheless a distinct one.
- 10) Cantwell's well documented discovery challenges, though beyond his ultimate control, were at least discovered initially in March of this year. Though Cantwell argues otherwise, an argument could at least in theory be made that, had he acted differently, the issues may have been resolved more quickly, or that he should have ~~specifically~~ specifically sought a continuance sooner.
- 11) In this instance, trial is imminent even as Cantwell tries to determine just what it is he does not yet know, and it is consequently inconceivable that there is any thing he could do to remedy these issues before trial, under his own power.
- 12) For the above reasons, Cantwell moves this Court to grant him a 60 day extension of time to respond to all filings from 9-1-2021 forward.

Respectfully Submitted

Christopher Cantwell 10-19-2021

